

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
NEWNAN DIVISION

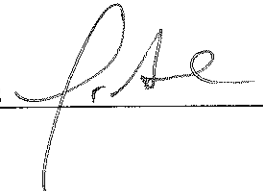
IN RE:) CHAPTER 13
)
BYRON EDWARD HEAD) CASE NO. 15-10144-WHD
PEPPAR WRIGHT HEAD)
)
DEBTORS.)

**CHAPTER 13 TRUSTEE'S
OBJECTION TO CONFIRMATION & MOTION TO DISMISS**

COMES NOW Adam M. Goodman, Chapter 13 Trustee, and objects to confirmation of the plan and files this motion to dismiss under 11 U.S.C. Section 1307(c), for cause, including the following reasons:

1. The Debtors have failed to attend the 11 U.S.C. Section 341 hearing.
2. The Debtors have failed to maintain payments into this case as required by 11 U.S.C. Section 1326.
3. The Debtors have failed to provide the Trustee with a copy of the 2014 federal tax return or transcript of such return for the most recent tax year ending immediately before the commencement of the instant case and for which a federal income tax return was filed, in violation of 11 U.S.C. Section 521(e)(2)(A)(i).
4. Pursuant to information received from the Internal Revenue Service, 2014 tax returns have not been provided to the taxing authorities; thereby, preventing the Chapter 13 Trustee from evaluating the feasibility of the Chapter 13 Plan, in violation of 11 U.S.C. Sections 1322(d) and 1325(a)(6).

WHEREFORE, Trustee moves this Honorable Court to inquire into the above objections at the separately scheduled and noticed confirmation hearing, deny confirmation of the Chapter 13 plan, dismiss the case, and for such other and further relief that this Court deems just and proper.

/s/ Jonathan S. Adams 
Jonathan S. Adams
GA Bar No. 979073
Attorney for Chapter 13 Trustee

Adam M. Goodman, Chapter 13 Trustee
Suite 200 – 260 Peachtree Street, N.W.
Atlanta, Georgia 30303
(678) 510-1444

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15-10144-WHD

CERTIFICATE OF SERVICE


This is to certify that I have this day served:

DEBTOR(S):
BYRON EDWARD HEAD
PEPPAR WRIGHT HEAD
940 SEABREEZE LAKE RD.
BUCHANAN, GA 30113

DEBTOR(S) ATTORNEY:
VAN PELT & DUFOUR
527 NEWNAN ST
CARROLLTON, GA 30117

in the foregoing matter with a copy of this Objection to Confirmation & Motion to Dismiss by depositing in the United States Mail a copy of same in a properly addressed envelope with adequate postage thereon.

Wednesday, March 11, 2015

/s/ 

Jonathan S. Adams
GA Bar No. 979073
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